

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**TPP TRIAL DEFENDANTS' MOTION TO EXCLUDE THE OPINIONS OF  
DR. RENA CONTI**

**PLEASE TAKE NOTICE** that on March 18, 2024, Defendants Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai U.S., Inc.; Princeton Pharmaceutical Inc.; Solco Healthcare U.S., LLC; Teva Pharmaceuticals USA, Inc.; Teva Pharmaceutical Industries Ltd.; Actavis LLC; Actavis Pharma, Inc.; Torrent Pharmaceuticals Ltd.; and Torrent Pharma, Inc. (collectively, the “TPP Trial Defendants”), by and through their undersigned counsel, shall move for the entry of an Order excluding the testimony of plaintiffs’ proposed expert Dr. Rena Conti. This motion is made to the Hon. Robert B. Kugler, United States District Judge, pursuant to Rule 702 of the Federal Rules of Evidence and the applicable local rules of this Court.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, the TPP Trial Defendants shall rely on the accompanying Memorandum of Law in Support of TPP Trial Defendants’ Motion to Exclude the Opinions of Dr. Rena Conti, and the exhibits thereto.

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted herewith;

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested, if this motion is opposed; and

**PLEASE TAKE FURTHER NOTICE** that a Certificate of Service attesting to the date and manner of service is submitted herewith.

Dated: February 12, 2024

Respectfully submitted,

By: /s/ Jessica Davidson

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP

Jessica Davidson (NY Bar No. 6034748)  
*Liaison Counsel for Manufacturer  
Defendants*

Allison M. Brown (NJ Bar No. 044992012)  
One Manhattan West  
New York, New York 10001  
Phone: (212) 735-3222  
Fax: (917) 777-3222  
jessica.davidson@skadden.com  
allison.brown@skadden.com

Nina R. Rose (DC Bar No. 975927)  
1440 New York Avenue, N.W.  
Washington, D.C. 20005  
Phone: (202) 371-7000  
Fax: (202) 661-0525  
nina.rose@skadden.com

*Attorneys for Zhejiang Huahai  
Pharmaceutical Co., Ltd., Huahai U.S.,  
Inc., Princeton Pharmaceutical Inc., and  
Solco Healthcare U.S., LLC*

/s/ Gregory E. Ostfeld

Gregory E. Ostfeld  
GREENBERG TRAURIG, LLP  
Tiffany M. Andras  
77 West Wacker Drive, Suite 3100  
Chicago, Illinois 60601  
Tel: (312) 456-8400  
ostfeldg@gtlaw.com  
andrast@gtlaw.com

Lori G. Cohen, Esq.  
Victoria Davis Lockard  
Steven M. Harkins  
Terminus 200  
3333 Piedmont Rd., NE, Suite 2500  
Atlanta, Georgia 30305  
Tel: (678) 553-2385  
Fax: (678) 553-2386  
cohenl@gtlaw.com  
lockardv@gtlaw.com  
harkinss@gtlaw.com

*Attorneys for Teva Pharmaceuticals  
USA, Inc., Teva Pharmaceutical  
Industries Ltd., Actavis LLC, and Actavis  
Pharma, Inc.*

/s/ Alexia R. Brancato  
Alexia R. Brancato  
Devora W. Allon  
KIRKLAND & ELLIS LLP  
601 Lexington Avenue  
New York, New York 10022  
Tel: (212) 446-5967  
Fax: (212) 446-6460  
alexia.brancato@kirkland.com  
devora.allon@kirkland.com

*Attorneys for Defendants Torrent  
Pharmaceuticals Ltd. and Torrent  
Pharma, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 12, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson  
Jessica Davidson